

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	CRIMINAL NO. 05-10125-WGY
	)	
v.	)	
	)	
MARY LEMPITSKI	)	

JOINT FILING REGARDING INITIAL STATUS CONFERENCE

The United States and Defendant Mary Lempitski ("Defendant"), through the undersigned attorneys, hereby submit the following report in anticipation of the initial status conference scheduled for July 12, 2005.

1) The parties do not presently anticipate that relief from the timing requirements imposed by L.R. 116.3 is necessary. The parties are working out a schedule to enable defense counsel to review documents and tangible items that are in the government's possession, custody, and control. After defense counsel has completed that review, defense counsel will notify the Court if relief from any of the applicable timing requirements is necessary.

2) Defendant has requested discovery concerning expert witnesses under Fed. R. Crim. P. 16(a)(1)(E). The parties propose that the government provide such discovery to Defendant, 30 days before a firm trial date in this case. The parties further propose that Defendant provide reciprocal discovery to the government concerning expert witnesses 15 days before a firm trial date in this case.

3) The government has provided a substantial amount of discovery materials to Defendant to date and has made additional

discovery materials available to Defendant for review. The government cannot anticipate at this time whether it will provide additional discovery as a result of its future receipt of information, documents, or reports of examination or tests.

4) A motion date should not be set at this time.

5) The parties request that all time between Defendant's initial appearance and July 12, 2005 be excluded.

6) The parties do not know whether a trial is anticipated. If this case were to go to trial, the parties anticipate that the trial would last approximately 7 trial days.

7) The parties request a final status conference 30 days before the trial date in this case.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Emily R. Schulman

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EMILY R. SCHULMAN  
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By: /s/ Daniel J. Cloherty  
DANIEL J. CLOHERTY, ESQ.  
Counsel for Mary Lempitski

July 8, 2005